

1 RENE L. VALLADARES
2 Federal Public Defender
3 State Bar No. 11479
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5 Assistant Federal Public Defender
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8 (702) 388-6577

9 Attorney for Joshua A. Martinez

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JOSHUA A. MARTINEZ,

16 Defendant.

Case No. 2:21-cr-00219-APG-DJA

**STIPULATION TO CONTINUE
REPLY TO MOTION TO
SUPPRESS DEADLINE**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
18 Frierson, United States Attorney, and Daniel Schiess, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public
21 Defender, counsel for Joshua A. Martinez, that the Reply to Motion to Suppress
22 currently due on October 28, 2022, be vacated and continued by two weeks, to
November 14, 2022.¹

23 This Stipulation is entered into for the following reasons:
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¹ Two weeks is November 11, 2022, which is the Veteran's Day holiday.
Monday November 14 is the next business day.

1 1. Defense counsel needs additional time to respond to the arguments
2 raised in the government's response.

3 2. The extra time requested will not delay the trial in this matter, set
4 for February 6, 2023.

5 3. The defendant is out of custody and agrees with the need for the
6 continuance.

7 4. The parties agree to the continuance.

8 This is the first request for a continuance of the reply deadline.

9 DATED: October 26, 2022.

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11 RENE L. VALLADARES
12 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

13 /s/ Joanne L. Diamond
14 By _____
15 JOANNE L. DIAMOND
 Assistant Federal Public Defender

 /s/ Daniel Schiess
 By _____
 DANIEL SCHIESS
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,

6 v.

7 JOSHUA A. MARTINEZ,
8 Defendant.

Case No. 2:21-cr-00219-APG-DJA

ORDER

9
10 IT IS THEREFORE ORDERED that the Reply to Motion to Suppress
11 currently due on Friday, October 28, 2022, be vacated and continued to November
12 14, 2022.

13 DATED this ____ day of October, 2022.

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16 UNITED STATES DISTRICT JUDGE
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